Susan M. Sharko 973-549-7350 Direct 973-360-9831 Fax susan.sharko@dbr.com

Law Offices

600 Campus Drive Florham Park, NJ 07932-1047

973-549-7000 phone 973-360-9831 fax www.drinkerbiddle.com

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October 27, 2016

#### VIA ECF

Honorable Freda L. Wolfson, U.S.D.J. United States District Court Clarkson S. Fisher Building & US Courthouse 402 East State Street Trenton, NJ 08608

Re: In re: Johnson & Johnson Talcum Powder Products Marketing, Sales
Practices and Products Liability Litigation
MDL No. 2738

Dear Judge Wolfson:

Pursuant to the Court's request, enclosed please find an Order staying all deadlines to answer and or respond to initial pleadings and motion deadlines, and below please find a summary of the current deadlines pending in cases in the *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Litigation*.

# A. Pending Responsive Pleadings that Need to be Filed but Deadlines Have Expired

The following cases have responsive pleadings that need to be filed for the J&J defendants, but deadlines have recently expired:

- 1. Barbara Lee v. Johnson & Johnson, et al., Docket No. 3:16-cv-07414
- 2. Olivia Prout v. Johnson & Johnson, et al., Docket No. 3:16-cv-07474
- 3. Carol Shoup v. Johnson & Johnson, et al., (No DNJ Docket Number Yet)
- 4. Carlyne Willis v. Johnson & Johnson, et al., (No DNJ Docket Number Yet)

## B. <u>Upcoming Responsive Pleading Deadlines</u>

The following cases have upcoming responsive pleading deadlines for the J&J defendants:

1. Leon Poche v. Johnson & Johnson, et al., Docket No. 3:16-cv-07501– Due 10/28

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- 2. Lauren Matthews v. Johnson & Johnson, et al., Docket No. 3:16-cv-07490 Due 10/31
- 3. Linda Blazio v. Johnson & Johnson, et al., Docket No. 3:16-cv-07489 Due 10/31
- 4. Paul Anthony Resor, Jr. v. Johnson & Johnson, et al., (No DNJ Docket Number Yet) Due 10/31
- 5. Shintelle Joseph v. Johnson & Johnson, et al., Docket No. 3:16-cv-07465 Due 11/3
- 6. Kevin Richards v. Johnson & Johnson, et al., Docket No. 3:16-cv-06661 Due 11/7
- 7. Peggy Vallot v. Johnson & Johnson, et al., (No DNJ docket number yet) Due 11/14

The following cases have upcoming responsive pleading deadlines for defendant Imerys:

- 1. Linda Blazio v. Johnson & Johnson, et al., Docket No. 3:16-cv-7489 Due 11/8
- 2. Lauren Matthews v. Johnson & Johnson, et al., Docket No. 3:16-cv-7490 Due 11/8
- 3. Olivia Prout v. Johnson & Johnson, et al., Docket No. 3:16-cv-7474 Due 11/8
- 4. Paul Anthony Resor, Jr., v. Johnson & Johnson, et al. (No DNJ Docket Number Yet) Due 11/8
- 5. Peggy Vallot v. Johnson & Johnson, et al., (No DNJ Docket Number Yet) Due 11/8

#### C. No Responsive Pleading Yet Due

In the following case, a motion to stay was filed and granted before any responsive pleading was due:

1. Delores Gould v. Johnson & Johnson, et al., Docket No. 3:16-cv-06567

#### D. Pending Response to Motion to Remand

Motions to remand have been filed in the following cases, but the deadline for defendants' opposition has not yet expired:

1. Paula Jackson v. Johnson & Johnson, et al., Docket No. 3:16-cv-07488, Response in Opposition to Motion to Remand Due: 11/8/16

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2. Bridget McBride v. Johnson & Johnson, et al., Docket No. 3:16-cv-7891, Response in Opposition to Motion to Remand Due: 11/8/16

### E. Pending Response to Motion to Dismiss

In the following cases, motions to dismiss pursuant to FED. R. CIV. P. R. 12(b)(2) or R. 12(b)(6) were filed prior to the entry of an Order staying all proceedings pending a decision by the Judicial Panel on Multidistrict Litigation. Therefore, no response deadlines have been set.

- 1. Elouise Anderson v. Johnson & Johnson, et al., Docket No. 3:16-cv-07087 (lack of personal jurisdiction)
- 2. Patrick Barker v. Johnson & Johnson, et al., Docket No. 3:16-cv-07656
- 3. Kenneth Batiste v. Johnson & Johnson, et al., Docket No. 3:16-cv-07499
- 4. Carol Casey v. Johnson & Johnson, et al., Docket No. 3:16-cv-07477
- 5. Delores Cerrone-Kennedy v. Johnson & Johnson, et al., Docket No. 3:16-cv-07895
- 6. Maggy Francis v. Johnson & Johnson, et al., Docket No. 3:16-cv-07530
- 7. Katina Harper v. Johnson & Johnson, et al., Docket No. 3:16-cv-07892
- 8. Nancy Hicks v. Johnson & Johnson, et al., Docket No. 3:16-cv-07428
- 9. Paula Jackson v. Johnson & Johnson, et al., Docket No. 3:16-cv-07488
- 10. Deborah Johnson v. Johnson & Johnson, et al., Docket No. 3:16-cv-07664
- 11. Tod Alan Musgrove v. Johnson & Johnson, et al., Docket No. 3:16-cv-06568
- 12. Michael Olichney v. Johnson & Johnson, et al., Docket No. 3:16-cv-07537
- 13. Richard Phillips v. Johnson & Johnson, et al., Docket No. 3:16-cv-07336
- 14. Lucy Rempas v. Johnson & Johnson, et al., Docket No. 3:16-cv-07571
- 15. Carol Robinson v. Johnson & Johnson, et al., Docket No. 3:16-cv-07502
- 16. Brenda Shelton v. Johnson & Johnson, et al., Docket No. 3:16-cv-07415
- 17. Nell Rose Strickland v. Johnson & Johnson, et al., Docket No. 3:16-cv-07492
- 18. Brenda Traylor v. Johnson & Johnson, et al., Docket No. 3:16-cv-07425
- 19. Allison Walker v. Johnson & Johnson, et al., Docket No. 3:16-cv-07503
- 20. Lisa Wilson v. Johnson & Johnson, et al., Docket No. 3:16-cv-07886
- 21. Amy Wood v. Johnson & Johnson, et al., (No DNJ Docket Number Yet)

Defendants filed a motion to dismiss pursuant to FED. R. CIV. P. R. 12(b)(2) or R. 12(b)(6) in the following cases, but no oppositions have been filed by plaintiffs:

- 1. *Diana Shinske v. Johnson & Johnson, et al.*, Docket No. 3:16-cv-07894; Plf response deadline: 11/14/16
- 2. *Jackie Epps v. Johnson & Johnson, et al.*, Docket No. 3:16-cv-07890; Plf response deadline: 11/7/16
- 3. Dolorae Handy v. Johnson & Johnson, et al., Docket No. 3:16-cv-07570

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- 4. Gregory Kehres v. Johnson & Johnson, et al., Docket No. 3:16-cv-07657
- 5. Patricia Kuhn v. Johnson & Johnson, et al., Docket No. 3:16-cv-07312
- 6. Ada Rich-Williams v. Johnson & Johnson, et al., Docket No. 3:16-cv-06489
- 7. Rene Slayden v. Johnson & Johnson, et al., Docket No. 3:16-cv-7315

### F. Pending Decision/Ruling on Motions

In the following cases, motions to dismiss pursuant to FED. R. CIV. P. R. 12(b)(2) or R. 12(b)(6) and oppositions have been filed, but no decision has yet been made:

- 1. Mona Estrada v. Johnson & Johnson, et al., Docket No. 3:16-cv-07492
- 2. Charles Fenstemaker v. Johnson & Johnson, et al., Docket No. 3:16-cv-07418
- 3. Angela Lovato v. Johnson & Johnson, et al., Docket No. 3:16-cv-07427

In the following case, Imerys filed a motion to amend order pursuant to 28 U.S.C. §1292(b) and responsive briefs have not yet been filed:

1. Nancy Bors v. Johnson & Johnson, et al., Docket No. 3:16-cv-7570

Thank you for your consideration of this matter.

Respectfully,

Drinker Biddle & Reath LLP

Susan M. Sharko

cc: All Counsel of Record (via ECF)

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